



Letter to Judge B. Schofield

November 26th, 2019

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Samantha Siva Kumaran
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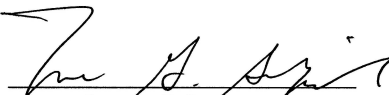
November 26th, 2019

It is ORDERED that Plaintiff shall file proof of service of the original Complaint on ECF by December 5, 2019, and shall file any Amended Complaint by December 26, 2019.

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Dated: December 2, 2019
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Kumaran vs. Northland Energy Trading et al* 1:19-Cv-08345 (LGS-DCM)

Dear Judge Schofield:

Pursuant to the Court's November 15th, 2019 Order ([Dkt. 4](#)), Plaintiffs write to advise the Court that in accordance with Federal Civil Rule 15(a)(1), Plaintiffs intend to amend its Complaint as a matter of right ("First Amended Complaint"). Plaintiffs have been in communication with Defendants' counsel, who are fully aware of the filing of this Complaint and Plaintiffs' intention to amend since September 2019.

In Defendants' counsel email dated September 13th 2019, hereto attached as **Exhibit A**, Defendants have agreed to accept service of the Complaint via electronic transmission and email.

Plaintiffs are working as quickly as possible to amend the Complaint. Plaintiffs have requested a Meet and Confer from Defendants regarding a Stipulated Protective Order for protection of both parties' trade secret and confidential information in various exhibits. Pending that being resolved, Plaintiffs therefore will provide service via email to Defendants of the original Complaint, on or before **December 4th, 2019** in accordance with Federal Civil Rule 4.

Plaintiffs' first amended complaint as a matter of right is due within twenty one (21) days of service, and therefore, in compliance with Federal Civil Rule 15(a)(1), Plaintiffs will commit to filing its First Amended Complaint on or before **December 26th, 2019**

Wishing the court a Happy Thanksgiving.

Respectfully submitted,

//SSK//

Samantha S. Kumaran
samantha@timetricsrisk.com

Service of Complaint

Received:  Friday, September 13, 2019 11:45 AM

From: **Brooks, Michael** michael.brooks@bracewell.com

To: **samantha@timetricsrisk.com** samantha@timetricsrisk.com

CC: **Ball, David** david.ball@bracewell.com

Ms. Kumaran,

We understand that you and The A Star Group have received a summons to serve a complaint from the SDNY on Defendants Northland Energy Trading, Hedge Solutions, and Richard Larkin. As you know, we represent Defendants. We are writing to accept service of the summons and complaint, which we can agree will be deemed validly served upon you emailing me a scan or pdf of the file-stamped summons and complaint.

Defendants reserve all rights and remedies.

Regards,

Michael

MICHAEL BROOKS

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